

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 4, 2010

Dec 423832
5-863126 300
 6155

Scimetrics Ltd.
c/o RegWest Company, LLC
30856 Rocky Road
Greeley, CO 80631-9375

Attention: Ms. Kim Davis

Subject Kaput®-D Combo Bait Blocks
 EPA Reg. No. 72500-18
 Compliance with May 28, 2008, Rodenticide Risk Mitigation Decision
 Labeling Changes
 Your amended application of November 6, 2009

Purpose This submission includes revised labels to comply with the Risk
 Mitigation Decision and to make changes to the warranty, disposal, and
 other texts, under sec 3 of the Federal Insecticide, Fungicide, and
 Rodenticide Act (FIFRA).

Label The labeling submitted with the above letter, under the Federal
 Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable,
 provided you submit one (1) copy of final printed labeling to us, with the
 following change, before you ship your product.

1. Delete "Easy [EZ] to use [Bait] Blocks".
2. After "3. Dispose ... this label." add the following separate paragraph: "Tamper-resistant bait stations must be used if children, pets, non-target mammals, or birds have access to bait."
3. In your "**Storage and Disposal**" section, delete "or, if allowed ... out of smoke). after "by incineration" in both places where the phrase occurs.

**Label-
continued**

4. Place your "**FIRST AID**" and "**Note to Physician or Veterinarian**" texts under "**Hazards to Humans and Domestic Animals**."
5. Revise the "**NOTE TO PHYSICIAN OR VETERINARIAN**" section as follows:

**Label-
continued**

TREATMENT FOR PET POISONING

If animal eats bait, call veterinarian or 1-800-xxx-xxxx [optional] at once.

NOTE TO PHYSICIAN OR VETERINARIAN

Contains the anticoagulant Diphacinone. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K₁.

6. Under "**LIMITATION OF LIABILITY**", delete the 3rd Paragraph ("**USES WITH ... specifically recommended.**") as this product is never tank mixed.
7. Before "Do not sell this product in individual containers holding less than 4 pounds of bait.", add "Do not apply farther than 50 feet from buildings."
8. Modify your endangered species text as follows: "Do not use this product to kill listed species within occupied habitats of threatened or endangered rodents."

**Terms and
Conditions**

Prohibited for Sale in Stores Oriented towards Residential Consumers: Grocery, Drug, Hardware and Home Improvement. Acceptable for Sale in Stores Oriented toward Agricultural Consumers: Farm Agricultural, Tractor Stores.

Product may not be sold in packaging that holds less than 4 pounds of bait.

**Compliance
with Risk
Mitigation**

This product is in full compliance with the Agency's revised May 28, 2008 "*Risk Mitigation Decision for Ten Rodenticides*".

**Existing
stocks**

Stocks of existing labels of this product may be used until June 11, 2011.

Consequence for non-compliance If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Questions If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-305-6596 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

File Location Dan Peacock, Flash Drive, 16gb, E:\4G Dan\Doc\Word\Diphacin-Imidacloprid\72500-18\72500-18, RMD + other label changes, 2-4-2010.doc

{Front Panel}

Kaput®-D Combo Bait Blocks

This product may be used only inside and within 50 feet of buildings or inside transport vehicles (ships, trains or aircraft).

Rodenticide + [and] Insecticide

Easy [EZ] to Use [Bait] Blocks

Kills Norway Rats, Roof Rats and House Mice

A Bait Containing a Rodenticide to Kill Norway Rats, Roof Rats and House Mice and an Insecticide to Aid in the Reduction of Flea Populations on Listed Rodent Hosts. Rats and mice start to die 4 to 5 days after feeding begins.

ACCERTED
With COMMENTS
In EPA Letter Dated:

FEB 4 2010

Active Ingredient:

Diphacinone (CAS No. 82-66-6)

Imidacloprid (CAS No. 138261-41-3)

Other Ingredients

Total

Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

0.003%
110.20%
99.995%
100.000%

72500-18

Keep Out of Reach of Children

CAUTION

See back panel for First Aid and additional Precautionary Statements.

EPA Reg. No. 72500-18

EPA Est. 72500-CO-1

[Contains {number} bait blocks]

Net Weight: _____

{4 through 25 pounds}



[More Than Rodent Management Products]

{Back Panel}

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This label must be in the user's possession at the time of product application.

Apply this product only for the sites, pests and application methods specified on this label.

If sufficient quantities of this bait are ingested, the use of this product may aid in the reduction of fleas that commonly infest listed rodent hosts, including *Xenopsylla cheopis*.

Read this Label:

Read this entire label and follow all use directions and use precautions.

IMPORTANT: Do not expose children, pets or other non-target animals to rodenticides. To help prevent accidents:

1. Store product not in use in locations out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and non-target wildlife in tamper-resistant bait stations. These stations must be resistant to destruction by children under six years of age and dogs, and

must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hoofed livestock, raccoons, bears or other potentially destructive animals or in areas prone to vandalism.

3. Dispose of product container, as well as unused, spoiled and unconsumed bait, as specified on this label.

Use Restrictions: Use this product to kill only Norway rats, roof rats and house mice, and to aid in the reduction of their flea populations, in and around non-residential buildings, industrial/agricultural buildings and similar man-made structures, and inside transport vehicles. Do not place bait in areas where there is a possibility of contaminating food or surfaces that come into direct contact with food. Do not use in edible product areas of feed processing plants, restaurants or other areas where food or feed is commercially prepared or processed. Do not contaminate food/feed or food/feed-handling equipment or place near or inside ventilation duct openings. Do not use this product to kill *Peromyscus* sp[p. mice within the occupied habitats of threatened or endangered *Peromyscus* spp. mice or other types of threatened or endangered rodents. Wear glove when handling bait or animal carcasses. Do not sell this product in individual containers holding less than 4 pounds of bait.

Do not use this product where non-target species are likely to be adversely affected by it or where threatened or endangered species potentially at risk from it are present. Do not allow young children, pets, domesticated animals or persons not associated with the bait application to be in areas where the bait is being applied. Wear gloves when applying bait. With detergent and hot water, wash all utensils used for applying bait. Do not use these utensils for mixing, holding or transferring foods or feeds.

Selection of Treatment Areas: Determine areas where rats or house mice will most likely find and consume bait. Generally, these areas will be along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors or walls, beside burrow openings and other locations where signs of rodents have been seen. Remove as much alternative food as possible.

Application Directions:

Rats: Apply 3 to 15 blocks per bait placement. Space placements at intervals of 15 to 30 feet in infested area. Maintain an uninterrupted supply of fresh bait for at least 10 days or until there no longer are signs of new feeding by rats.

House Mice: Apply 1 bait block per placement. Space placements at intervals of 8 to 12 feet in infested area. At points of extremely high mouse activity use 2 bait blocks. Maintain an uninterrupted supply of fresh bait for at least 15 days or until fresh signs of feeding by house mice cease to appear.

Follow-up (Rats & Mice): Immediately replace contaminated or spoiled bait. While wearing gloves, properly collect and dispose of all dead animals and leftover bait. To discourage reinfestation, limit sources of rodent food, water and harborage as much as possible. If reinfestation occurs, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations. Regularly check the stations and replace bait as needed.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container in a cool, dry place inaccessible to children and pets. **Pesticide**

Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Disposal:** Non-refillable container; do not reuse or refill this container. **{Plastic:}** Offer

for recycling, if available, or reconditioning, if appropriate; otherwise, dispose of empty container in a sanitary landfill; or by incineration; or, if allowed by State and local authorities, by burning (if burned, stay out of smoke).

{Paper:} Offer for recycling, if available; otherwise dispose of empty box [bag] in a sanitary landfill; or by incineration; or, if allowed by state and local authorities, by burning (if burned, stay out of smoke).

Batch Code [Lot Number]: {Description of where lot number is located}

9/16

First Aid

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Poison Information Center at 1-800-858-7378 for emergency medical treatment information.

If swallowed, immediately call a poison control center or doctor for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on skin or clothing, take off contaminated clothing. Immediately rinse skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eyes, hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Note to Physician

This product reduces the clotting ability of the blood and may cause hemorrhaging. If ingested, administer Vitamin K1 intramuscularly or orally as indicated for bishydroxycoumarin overdoses. Vitamin K1 is antidotal at doses of 10-20 mg total (not mg/kg).

Treatment of Pet Poisoning

If animal eats bait, call a veterinarian [or 1-800-{phone number}] at once.

Note to Veterinarian

Anticoagulant Diphacinone: For animals ingesting bait and/or showing poisoning signs (bleeding or elevated prothrombin times), give Vitamin K1 at 2-5 mg/kg. Repeated doses may need to be given, based upon monitoring of prothrombin times. In severe cases, blood transfusion may be necessary.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Keep away from children, domestic animals and pets. Do not get in eyes, on skin or on clothing. **Personal Protective Equipment (PPE)**: All handlers (including applicators) must wear: shoes plus socks and gloves. Any person who retrieves carcasses or unused bait following application of this product must wear gloves.

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, thoroughly wash hands after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet, then change into clean clothing.

Environmental Hazards

This product is highly toxic to aquatic invertebrates and toxic to mammals and birds. Dogs and predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply this product directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER, AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE

2/7

PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, CROP OR PLANT DAMAGE, OR LOSS OF YIELD, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE WEATHER, WIND, AND TEMPERATURE, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER, AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER OR MANUFACTURER, AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY OTHER REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS. NO WARRANTIES SHALL BE CREATED BY COURSE OF DEALING, USAGE OF TRADE, OR COURSE OF PERFORMANCE. THERE ARE NO WARRANTIES THAT EXTEND BEYOND THE FACE HEREOF. THE SELLER OR MANUFACTURER ASSUMES NO RESPONSIBILITY THAT THE GOODS WILL BE FIT FOR ANY PARTICULAR PURPOSE FOR WHICH YOU MAY BE BUYING OR USING THE GOODS, EXCEPT AS OTHERWISE PROVIDED IN THE CONTRACT.

LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NEITHER MANUFACTURER NOR SELLER SHALL BE LIABLE TO BUYER OR USER OR TO CUSTOMERS OF BUYER, IF ANY, FOR INDEMNIFICATION OR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE USE, MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY, SHALL BE FOR DAMAGES NOT EXCEEDING THE PURCHASE PRICE OF THE GOODS AND, IF BUYER OR USER WISHES, THE RETURN OF THE GOODS BY BUYER TO SELLER.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the goods, and return it unopened to the Seller, and the purchase price will be refunded. By using the goods, you expressly agree to all of the terms and conditions of this contract.

USES WITH OTHER PRODUCTS (TANK MIXES) If the goods are used in combination with any other product except as specifically recommended in writing, then, to the extent consistent with applicable law, Seller or Manufacturer shall have no liability for any crop, plant, or other loss, damage, or injury arising out of its use in any such combination not so specifically recommended.

Manufactured by:
**Scimetrics**
LTD. CORP.
New Solutions to Old Problems
P.O. Box 1045
Wellington, CO 80549-1045
(970) 482-1330
mole@scimetricsltd.com

[] Denotes optional/alternate language
{ } Denotes language that does not appear on the market label